

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Crystal Bolduc,

Plaintiff,

v.

Amazon.com Inc.,

Defendant.

Case No. 4:22-cv-615-ALM

**JOINT MOTION TO EXTEND TIME TO FILE RULE 26(f) REPORT, HOLD
RULE 26(f) CONFERENCE, AND SERVE INITIAL DISCLOSURES**

Earlier today the parties met and conferred about the Rule 26(f) report, which is due on March 24, 2023. Because the Court has ordered discovery stayed pending its resolution of the defendant's forthcoming motion to dismiss, counsel for both parties agreed that it would be prudent to postpone submission of the Rule 26(f) report until after the Court rules on the defendant's Rule 12(b)(1) and 12(b)(6) motions. The parties can more easily determine appropriate deadlines once they know the date of the Court's ruling on the Rule 12(b) matters, and if Court grants the motion to dismiss it will obviate the need for a discovery plan. The parties therefore jointly and respectfully ask the Court to extend the deadline to hold the Rule 26(f) conference until 21 days after the Court's ruling on the defendants' motion to dismiss, and to extend the deadlines to submit the Rule 26(f) report and serve initial disclosures until 30 days after the Court's ruling on the Rule 12(b) issues. A proposed order is attached.

Respectfully submitted.

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Dated: March 9, 2023

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CERTIFICATE OF SERVICE

I certify that on March 9, 2023, this document was served through CM/ECF

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